Pension Benefit Guaranty Corporation (PBGC)

Privacy Impact Assessment (PIA)

Office of Management and Administration
Government to Government (OMAG2G)

March 2022

1 Privacy Point of Contact

Name	Vincent McKinney
Title	Information System Owner
Phone	202-229-3932
Email	McKinney.Vincent@pbgc.gov

2 Privacy Impact Assessment

A Privacy Impact Assessment (PIA) is an analysis of how information is/will be handled:

i. To ensure handling conforms to applicable legal, regulatory, and policy requirements regarding privacy,

ii. To determine risks and effects of collecting, maintaining, and disseminating information in an identifiable form in an electronic information system, and

iii. To examine and evaluate protections and alternative processes for handling information to mitigate potential privacy risks.

Privacy concerns are highest for systems that contain Personally Identifiable Information (PII). PII is defined as information that can be used to distinguish or trace an individual's identity, either alone or when combined with other information that is linked or linkable to a specific individual. Because there are many types of information that can be used to distinguish or trace an individual's identity, the term PII is necessarily broad.

For example, consider a person named Mary Jones. There are over 200 million results in an internet search for this name. But if we combine information such as a date of birth, the last four digits of a (or worse, an entire) Social Security Number, or a spouse's name, the number of persons to whom we could be referring begins to narrow quite rapidly. These types of information are considered identifiers. Identifiers that uniquely identify a person are the focus of privacy protection.

2.1 The Components of the System

Name of component	Describe the component (1 or 2 sentences)	Does this component contain PII?	In what system of records (SORN) is this information stored?	What is the Legal Authority for collection of this information?	Does this system share PII internally (please detail in question 9)?
Federal Personnel/Payroll System (FPPS)	FPPS provides personnel and payroll support to numerous agencies. The system is customer-driven, creating and generating personnel transactions and enabling agencies to maintain records electronically.	Yes	OPM/GOVT-1- General Personnel Records	5 U.S.C. 1302, 2951, 3301,3372, 4118, 8347, and Executive Orders 9397, as amended by 13478, 9830, and 12107.	Yes
			OPM/GOVT-2- Employee Performance File System Record	5 U.S.C. 1104, 3321, 4305, and Executive Order 12107.	
			PBGC-3- Employee Payroll Leave and Attendance Record	29 U.S.C. 1302; 44 U.S.C. 3101; 5 U.S.C. 301; 5 U.S.C. 5501-5584.	
			OPM/GOVT-5- Recruiting, Examining, and Placement Records	5 U.S.C. 1302, 3109, 3301, 3302, 3304, 3305, 3306, 3307, 309, 3313, 3317, 3318, 3319, 3326, 4103, 4723, 5532, and 5533, and Executive Order

System	Authority
	9397.
OPM/GOVT-6- Personnel Research and Test Validation Records	5 U.S.C. 1303, 3301, and 4702.
OPM/GOVT-7- Applicant Race, Sex, National Origin, and Disability Status Records	5 U.S.C. 7201, sections 4A, 4B, 15A (1) and (2), 15B (11) and 15D (11); Uniform Guidelines on Employee Selection Procedures (1978); 43 FR 38297 et seq. (August 25, 1978); 29 CFR 720.301; and CFR 1613.301.
OPM/GOVT-9- File on Position Classification Appeals, Job Grading Appeals, and Retained Grade or Pay Appeals, and Fair Labor Standard Act (FLSA) Claims and Complaints	5 U.S.C. 5103, 5112, and 5115 for classification appeals, 5346 for job grading appeals, and 5366 for retained grade or pay appeals; 29 U.S.C. 204(f) for FLSA claims and

			Yes
	complaints; 31 U.S.C. 3702 for compensation and leave claims; and 5 U.S.C. 5581, 5582, and 5583, and 38 U.S.C. 5122 for disputes concerning the settlement of the account for a deceased Federal civilian officer or employee.	OPM/GOVT-1- General Personnel Records	5 U.S.C. 1302, 2951, 3301, 3372, 4118, 8347, and Executive Orders 9397, as amended by 13478, 9830, and 12107.
		OPM/GOVT-2- Employee Performance File System Records	5 U.S.C. 1104, 3321, 4305, and 5405, and Executive Order 12107.
			5 U.S.C. 1104, 3321, 4305, and
	Yes		
FPPS DataMart	FPPS DataMart is a tool used by HRD to generate business intelligence and analytics reports from FPPS and WTTS.		

System	Authority
	Executive Order 12107.
PBGC-3- Employee Payroll Leave and Attendance Records	29 U.S.C. 1302; 44 U.S.C. 3101; 5 U.S.C 301; 5 U.S.C. 5501-5584.
OPM/GOVT-5- Recruiting, Examining, and Placement Records	5 U.S.C. 1302, 3109, 3301, 3302, 3304, 3305, 3306, 3307, 309, 3313, 3317,3318, 3319, 3326, 4103, 4723, 5532, and 5533, and Executive Order 9397.
OPM/GOVT-6- Personnel Research and Test Validation Records	5 U.S.C. 1303, 3301, and 4702.
OPM/GOVT-7- Applicant Race, Sex, National Origin, and Disability Status Records	5 U.S.C. 7201, sections 4A, 4B, 15A (1) and (2), 15B (11), and 15D (11); Uniform Guidelines on Employee Selection Procedures (1978); 43 FR 38297 Et seq (August 25, 1978); 29 CFR 720.301; and 29 CFR 1613.301.

	OPM/GOVT-9-File on Position Classification Appeals, Job Grading Appeals, and Retained Grade or Pay Appeals, and Fair Labor Standard Act (FLSA) Claims and Complaints	No	N/A	5 U.S.C. 5103, 5112, and 5115 for classification appeals, 5346 for job grading appeals, and 5366 for retained grade or pay appeals; 29 U.S.C. 204 (f) for FLSA claims and complaints; 31 U.S.C. 3702 for compensation and leave claims; and 5 U.S.C. 5581, 5582, and 5583, and 38 U.S.C. 5122 for disputes concerning the settlement of the account for a deceased Federal civilian officer or employee.
FedTalent	FedTalent is PBGC's Learning Management System used to support Computer-Based Training and collaborative learning for PBGC federal employees and contractors. It is a software tool used to store and manage online training.	N/A	N/A	No

System	Description		SORN	Authority	
Electronic Official Personnel Folder (eOPF)	eOPF is an automated system used by federal employees to manage their official personnel files online. eOPF retains specific personal data such as payroll, performance records, awards, and attendance time.	Yes	OPM/GOVT-1- General Personnel Records	5 U.S.C. 1302, 3301, 301, 2951, 3372, 5 U.S.C 293 et seq. and Executive Order 9830 and 12107.	Yes
			OPM/GOVT -2- Employee Performance File System Records	5 U.S.C. 1104, 3321, 4305, and 5405, and Executive Order 12107.	
			OPM/GOVT – 3- Records of Adverse Actions, Performance Based Reduction in Grade Removal Actions, and Termination of Probationers	5 U.S.C. 3321, 4303, 7504, 7514, and 7543.	
			OPM/GOVT-7- Applicant Race, Sex, National Origin and Disability Status Records	5 U.S.C. 7201, sections 4A, 4B, 15A (1) and (2), 15B (11), and 15D (11); Uniform Guidelines on Employee Selection Procedures (1978); 43 FR 38297 et seq. (August 25, 1978); 29 CFR 720.301; and CFR 1613.301.	

System	Description		SORN	Authority	
			OPM/GOVT-10-Employee Medical File System Records	Executive Orders 12107, 12196, and 12564 and 5 U.S.C. chapters 11, 33, and 63.	Yes
Monster Hiring Management System (MHM)	MHM is an applicant tracking system used by HR Specialist to create job vacancy announcements and review, rank, and rate applicants online throughout the hiring process.	Yes	OPM/GOVT-5 – Recruiting, Examining and Placement Records	5 U.S.C. 1302, 3109, 3301, 3302, 3304, 3305, 3306, 3307, 309, 3313, 3317, 3318, 3319, 3326, 4103, 4723, 5532, and 5533, and Executive Order 9397.	
Workforce Tracking and Transformation System/Entry On-Duty System (WTTS/EODS)	Workforce data provided by the WTTS system assists in all phases of workforce planning and facilitates the personal security management of on and off-boarding of personnel. EODS provides a library of on-line forms to be filled out by a federal new hire. The forms are prefilled with information entered by the selectee during his/her application process.	Yes	OPM/GOVT-1 – General Personnel Records	5 U.S.C. 1302, 2951, 3301,3372, 4118, 8347, and Executive Orders 9397, as amended by 13478, 9830, and 12107.	Yes
			OPM/GOVT-5 – Recruiting, Examining and Placement Records	5 U.S.C. 1302, 3109, 3301, 3302, 3304, 3305, 3306, 3307, 309, 3313, 3317, 3318, 3319,	

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		disputes concerning the settlement of the account for a deceased Federal civilian officer or employee.

2.2 The System as a Whole

1. Please describe the purpose of the system when considered as a whole. Please include if this is an existing system (either an annual recertification update or a major change)

> OMAG2G consists of a suite of federal shared systems, applications, and Web-based programs utilized by PBGC Human Resources Department. All OMAG2G subsystems are owned and hosted by third-party agencies/vendors — the Department of the Interior (DOI) and Office of Personnel Management (OPM).
>
> DOI hosts the following systems:
>
> - Federal Personnel/Payroll System (FPPS)
>
> - DataMart (Oracle Business Intelligence Enterprise Edition (OBIEE))
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> - FedTalent Learning Management System
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> - Monster Hiring Management System (HMS)/ Position Classification
>
> - Workforce Tracking and Transformation System (WTTS)/Entrance on Duty System (EODS)
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> OPM hosts the following systems:
>
> - Electronic Official Personnel Folder (eOPF)

2. What are the Confidentiality, Availability, and Integrity ratings for the system as a whole?

Confidentiality	Moderate
Integrity	Moderate
Availability	Moderate

3. List and discuss the sources from which the system collects PII (for instance, from an individual, another federal agency, etc.), the format in which PII is collected (for instance, via a form, face-to-face, phone, etc.), the notification given at time of collection from an individual regarding the Privacy Act, and the ability to opt-out of collection (and the consequences of opting out). Include a copy of all forms and Privacy Act statements used to collect information.

1. HRD collects PII directly from individuals via paper forms or online forms and the Privacy Act Statements is provided at the time of collection.

   - Paper forms: Privacy Act Statement is part of the paper forms. Most of the paper forms PBGC uses are Federal Forms created by other Federal agencies (e.g., OPM, DHS, IRS, etc.)
   - Online forms: When individuals log onto the system to provide PII, the Privacy Act Statement is displayed on the screen. This system is a Software as a Service (SaaS) provided by another Federal Agency. Therefore, this portion of the control is inherited externally.

2. Applicants are given the opportunity to decline to provide their own information by not submitting their information for the employment opportunity. Declining to provide their information simply means that the individual chooses not to participate in the hiring process for that employment opportunity. New hire employees are also given the opportunity to decline providing their own information or by opting to participate in only benefit programs of their choosing. Declining to provide their information will prevent the new hire employee from enrolling in that benefit program.

4. Discuss any privacy controls that PBGC inherits from an external provider (cloud provider, third party provider, another government agency, etc.). If an Interconnection Security Agreement (ISA), Memorandum of Understanding (MOU), or similar document is in place, please summarize the privacy applicable portions of that document.

PBGC OMAG2G is responsible for all the applicable privacy controls while the Federal service providers are also responsible to implement the privacy controls.

The only control PBGC fully inherited from the Federal service provider, Department of the Interior (DOI) is *DI-02 Data Integrity And Data Integrity Board.*

PBGC has a MOU with DOI. Below is the summary of the privacy portion of the MOU.

"DOI and customer agency are responsible for compliance with the Privacy Act and related privacy laws, regulations, and policies, including publication of Privacy Act SORNs and requests for notification, access or amendment, for their respective records in this system where applicable. The collection, use, maintenance, sharing and disposal of PII must be consistent with the party's governing SORN(s) and agency privacy policy. The access use and sharing of PBGC data shall be governed by approved sharing agreements as established between DOI and PBGC. All requests for records or information, Privacy Act notification, access and amendment, Privacy Act complaints, and requests made under the Freedom of Information Act (FOIA) will be the responsibility of PBGC as the Client/Information owner."

PBGC has an Interagency Agreement (IAA) with OPM. The IAA included the standard privacy clause *"PBGC's Privacy Clause for Inclusion in IAA's".*

5. For the user roles in the system:

Table 1: FPPS

Role Name	Number of Users in that role	Approver	Access Level (Read, Write, etc.)	Recertification Date
Administrator	2	Vincent McKinney	Write	06/10/2021
Concurrer	15	Vincent McKinney	Read, Write	06/10/2021
Initiator	35	Vincent McKinney	Read, Write	06/10/2021
Requestor	4	Vincent McKinney	Read, Write	06/10/2021
Authorizer	71	Vincent McKinney	Read, Write	06/10/2021
SC1-SPO	36	Vincent McKinney	Write	06/10/2021
SC2-SPO LGAP	20	Vincent McKinney	Write	06/10/2021
Time and Attendance	12	Vincent McKinney	Write, Execute	06/10/2021
EEO	10	Vincent McKinney	Read	06/10/2021

Table 2: DataMart

Role Name	Number of Users in that role	Approver	Access Level (Read, Write, etc.)	Recertification Date
Consumer	25	Doug Beaver	Read	06/10/2021
Authorizer	7	Doug Beaver	Read, Write	06/10/2021
Scheduler	4	Doug Beaver	Read, Write	06/10/2021
ADM Group	2	Doug Beaver	Read, Write	06/10/2021
Publisher	4	Doug Beaver	Read, Write	06/10/2021

Table 3: FedTalent

Role Name	Number of Users in that role	Approver	Access Level (Read, Write, etc.)	Recertification Date
Site Manager	6	Helen Castle	Read, Write, Execute	06/10/2021
General User	2435	Helen Castle	Read	06/10/2021
Program Manager	3	Helen Castle	Read, Write	06/10/2021
Course Creator	2	Helen Castle	Read, Write,	06/10/2021
CSC Helpdesk	73	Helen Castle	Read	06/10/2021
Reports Runner	37	Helen Castle	Read, Write	06/10/2021
User Interface Manager	27	Helen Castle	Read, Write,	06/10/2021
Merge User Accounts	3	Helen Castle	Read, Write,	06/10/2021

Table 4: eOPF

Role Name	Number of Users in that role	Approver	Access Level (Read, Write, etc.)	Recertification Date
Investigator	6	Vincent McKinney	Read	06/10/2021
Super User	52	Vincent McKinney	Read	06/10/2021

Table 5: MHM

Role Name	Number of Users in that role	Approver	Access Level (Read, Write, etc.)	Recertification Date
Analytics	6	Vincent McKinney	Read, Write	06/10/2021
HR Specialist	20	Vincent McKinney	Read, Write	06/10/2021
User Management	2	Vincent McKinney	Read, Write	06/10/2021
Selecting Official	160	Vincent McKinney	Read, Write	This is a new role, as such, it was not included in the last account recertification

				dated 6/10/2021. This role will be included in the next HRMS account recertification.

Table 6: WTTS/EODS

Role Name	Number of Users in that role	Approver	Access Level (Read, Write, etc.)	Recertification Date
EEO	5	Vincent McKinney	Read, Write, Execute	06/10/2021
HR Representative	67	Vincent McKinney	Read, Write	06/10/2021
Manager (IBC)	5	Vincent McKinney	Read, Write, Execute	06/10/2021
Security Administrator	5	Vincent McKinney	Read, Write	06/10/2021
Supervisor	3	Vincent McKinney	Read, Write	06/10/2021

6. Does the System leverage the Enterprise Access Controls?

☒ Yes

☐ No

7. Discuss the Physical, Technical, and Administrative controls that are employed to secure the PII in the system.

OMAG2G physical security controls:

OMAG2G leverages DOI physical security controls employed to secure the PII in the system. These controls include security guards, key entry, and secured facility, etc.

The Human Resources Department (HRD) is the main user of OMAG2G. Access to HRD office is restricted to authorized personnel only.

OMAG2G technical security controls:

OMAG2G leverages DOI technical security controls employed to secure the PII in the system. These controls include password protection, configuration management, contingency planning, audit logging, firewalls, unique user identification names, encryption, intrusion detection systems, and vulnerability scanning, etc.

PBGC is responsible for reviewing and approving PBGC user access requests and performing annual user account recertifications.

OMAG2G administrative security:

For Administrative security controls, OMAG2G fully leverages DOI's incident response controls to secure the PII in the system. Awareness and Training, Incident Response, Personnel Security, Planning, Security Assessment and Authorization (SA&A) controls are hybrid between OMA and DOI. For example, OMA conducts the annual SA&A process and reviews DOI's SA&A package on site at least annually.

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8. For the PII in the system, discuss the actual/intended uses of the PII, the steps taken to limit the PII collected to the minimum needed, and the reasons the PII is necessary and relevant.

Intended use of the PII:

Collectively, these systems use PII to assist PBGC to accomplish the following business processes: hiring, on-boarding, processing personnel actions, processing benefits, off-boarding, creating reports, and managing employee records.

The PII in FPPS and eOPF is used to facilitate payroll, federal benefits, retirement and to ensure that personnel and payroll actions processed for individuals are properly reported to the appropriate financial entities and the Office of Personnel Management.

The purpose of PII in DataMart is to track the processing of personnel actions in FPPS and to meet agency reporting requirements.

eOPF is an electronic version of the paper OPF and a system for accessing the electronic folder online. The eOPF allows each employee to have an electronic personnel folder instead of a paper folder which spans the lifecycle of a federal employee's job tenure, and thus PII exists on specific personnel forms i.e., SF-50, S-52, Benefit documents, etc.

The PII in WTTS/EODS facilitates a centralized and standardized automated business capability for the on-boarding and off- boarding process of new federal employees and separations, provides system access for new hires to complete on-line forms, and transfer form data directly to FPPS and eOPF if applicable, and tracks SF-52 actions.

The PII in MHM is used to create job vacancy announcements and review, rank, and rate applicants online.

FedTalent contain no PII.

Steps to Limit PII:

To limit the collection of PII, HRD only utilizes the appropriate federal and agency specific forms and authorized supporting documentation for the collection of PII. HRD personnel or the applicable PBGC Department regularly review PBGC-specific forms for appropriate collection of PII. Privacy and HRD collaborate to minimize the collection of PII necessary to perform agency functions.

Reasons the PII is necessary and relevant:

These collective systems use PII information to assist PBGC with hiring, on-boarding, off-boarding, processing of personnel actions, benefits, and employee records management from all prospective and new employees within PBGC. WITTS/EODS uses PII to facilitate the management of on and off-boarding of federal personnel. DataMart collects PII for tracking the processing of personnel actions. The collection and use of SSNs are necessary to verify federal employment credentialing/eligibility and to allow employees to receive pay, pay taxes, obtain benefits, and enroll in federal financial and benefit programs to include direct deposit, beneficiary forms, etc.

9. Discuss the data flows within the system (include sources of data for data flowing into the system, destinations for data flowing out of the system, and any routine uses applicable to the system). For any information that is shared internally, be sure to discuss whether these data interconnections are noted in CSAM. Be sure to include any MOU, ISA, or Interagency Agreements.

Flow of Data in the system:

PII is shared with PBGC's HRD, Office of Information and Technology/Personnel Security Office, and PBGC's Payroll Travel Office. Data is shared internally through OMAG2G integration data feeds such as FPPS, WTTS, MHM, DataMart, EODS, eOPF, and a PBGC timekeeping system. The Interior Business Center (IBC) facilitates the electronic data feeds through daily, weekly, and/or biweekly uploads. Data feed is uploaded from PBGC to OMAG2G.

Flow of Data out of the system (other federal agencies):

1. To disclose information to the Department of Interior, IBC, as part of the payroll/personnel system to process payroll and benefit payroll deduction for employees via a secure trusteed network. This information is shared via OMAG2G systems FPPS, fax, or email.

2. Permanent records and specific disclosed data (SF-75/1150) contained in the eOPF and FPPS when an employee is transferring to the gaining Federal Agency upon written request or separates from PBGC in order to keep the official personnel file intact via a secure internet portal. This information is shared electronically via the eOPF secured system, US mail, email (password protected), or faxed per the gaining Agencies preference.

Other third parties:

1. Disclose information to officials of labor organizations recognized under 5 USC Ch. 71 when relevant and necessary to their duties and representation concerning personnel policies, practices, and matters affecting working conditions.

2. Disclose information to health insurance carriers contracting with OPM for FEHB.

3. Disclose information to Office of Personnel Management for retirement or death in service information.

4. Disclose information necessary to the Office of Federal Group Life Insurance (FEGLI) to verify election of insurance or claim payment.

5. To disclose information to education institutions on appointment of recent graduate to a position in the federal service and to colleges, university officials, and student loan lenders regarding information about students in Pathways Program, volunteer service, and Student Loan Repayment Program.

PBGC has a MOU/ISA with DOI.

10. Does the system leverage the commonly offered control for Accounting of Disclosures?

☒ Yes
☐ No

2.3 Privacy Office Review

Name of Reviewer	Shannon Kreshtool
Date Reviewed	3/15/2022
Expiration Date	3/15/2023
Result	☐Approved without conditions ☒Approved with conditions (see below). ☐Denied

(For Privacy Office Use Only)

Discuss analysis of risks and compensating controls (or other mitigation steps).

Not Applicable

Discuss any conditions on Approval

With regards to Physical/Technical/Administrative controls, the 2023 Assessment will provide delineation and documentation defining which controls are provided by PBGC and which come from DOI. In the coming year, HRD will work with the Privacy Office and the SSN Reduction Board to work towards eliminating the use of SSNs as the primary identifier for employees.